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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CENTER FOR BIOLOGICAL DIVERSITY,
et al.

Plaintiffs,

v.

UNITED STATES BUREAU OF LAND
MANAGEMENT, *et al.*

Defendants.

Case No. 3:21-CV-07171-SI

**JOINT STIPULATION FOR REVISED
BRIEFING SCHEDULE TO ALLOW
FOR ADDITIONAL DOCUMENTS TO
BE ADDED TO THE
ADMINISTRATIVE RECORD AND
[PROPOSED] ORDER**

On April 15, 2022, Federal Defendants filed the administrative records. Dkt. 24. In light of the size of the administrative records and the time it took to resolve the initial issues identified, the parties requested, and this Court granted, an additional two months to complete record review and related negotiations. Dkt. 27, 28. On September 16, 2022, Federal Defendants lodged privilege logs and associated materials relating to the administrative records. Dkt. 29, 29-1, 29-2. On September 28, 2022, Federal Defendants provided Plaintiffs with a supplement to the record containing just over 200 documents. On October 7, 2022, the parties filed a Joint Status Report proposing a briefing schedule to this Court. Dkt. 32. In the process of preparing their opening brief, Plaintiffs identified additional record-related issues. The parties have reached an agreement for resolution of these issues that will include a further supplement to the record. In light of the foregoing, and pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and request that the deadlines for briefing on summary judgment be delayed and revised according to the following schedule:

Plaintiffs' Statement re: Motion for Summary Judgement: **January 27, 2023**

Federal Defendants' Statement re: Cross-Motion for Summary Judgment Opening and Response: **April 14, 2023**

Plaintiffs' Statement re: Response and Reply: **June 16, 2023**

Federal Defendants' Statement re: Reply: **July 14, 2023**

The proposed hearing date of October 13, 2023 would remain unchanged.

Respectfully submitted this 4th day of January, 2023.

TODD KIM
Assistant Attorney General
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/s/ Paul A. Turcke (with permission)
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ATTESTATION OF CONCURRENCE

In accordance with Local Rule 5-1(h)(3), I hereby attest that all counsel whose signature is listed, and on whose behalf this e-filed document is submitted, concur in the filing's content and have authorized the filing. /s/ Victoria Bogdan Tejeda

[PROPOSED] ORDER

In light of the need to resolve any issues regarding the Administrative Record as indicated the Joint Stipulation, the updated briefing schedule is as follows:

Plaintiffs' Statement re: Motion for Summary Judgement: **January 27, 2023**

Federal Defendants' Statement re: Cross-Motion for Summary Judgment Opening and Response: **April 14, 2023**

Plaintiffs' Statement re: Response and Reply: **June 16, 2023**

Federal Defendants' Statement re: Reply: **July 14, 2023**

The proposed hearing date of October 13, 2023 remains unchanged.

Pursuant to the stipulation, IT IS SO ORDERED.

Dated: _____, 2023

By: _____
THE HONORABLE SUSAN ILLSTON
UNITED STATES JUDGE